

# **Exhibit 1**



Jason Davis  
[jdavis@dslawpc.com](mailto:jdavis@dslawpc.com)

October 19, 2020

Mr. Roberto Lopez, Jr.  
Assistant U.S. Attorney

Via E-mail: [Roberto.Lopez2@usdoj.gov](mailto:Roberto.Lopez2@usdoj.gov)

Re: 7:20-cr-01676; *USA v. Jose Luis Trejo*; pending in the United States District Court for the Southern District of Texas, McAllen Division

Dear Mr. Lopez:

I am writing concerning the Government's discovery obligations and would appreciate your prompt response to the following requests.

Pursuant to Fed. R. Crim. P. 12(b)(4)(B), Mr. Trejo requests notice of the Government's intent to use (in its evidence-in-chief at trial) any evidence that Mr. Trejo may be entitled to discover under Federal Rule of Criminal Procedure 16.

Mr. Trejo further specifically requests that the Government promptly produce the following information and materials:

1. Identify the "public official" referenced in the Indictment;
2. Identify the date(s) and recipient of any alleged bribe paid by or on behalf of Mr. Trejo;
3. Identify any participants and witnesses to any alleged payment of a bribe;
4. All 404(b) evidence the Government intends to introduce at trial;
5. Pursuant to Fed. R. Crim. P. 16(a)(1)(G), a summary of all expert testimony the Government intends to use under Fed. R. Evid. 702, 703, or 705 during its case-in-chief at trial;
6. Any T-III wire intercepts for any phone registered to or used by Mr. Trejo;
7. Any video recordings in which Mr. Trejo, any J&G Trejo Enterprises, Inc. d/b/a Best Medical Supply ("Best Medical") employees or representatives, or anyone else associated with this case was recorded;
8. Any audio recordings in which Mr. Trejo, any Best Medical employees or representatives, or anyone else associated with this case was recorded;

9. Any investigative reports referencing interviews with or statements by anyone mentioning: (1) Mr. Trejo; (2) the alleged person(s) receiving any alleged “bribe” as referenced in the Indictment; (3) the “public official” named in the Indictment;
10. Pursuant to Fed. R. Crim. P. 16(a)(1), the following: (1) the substance of any relevant oral statement allegedly made by Mr. Trejo, before or after arrest, in response to interrogation by a person Mr. Trejo knew was a Government agent if the Government intends to use the statement at trial; (2) any relevant written or recorded statement by Mr. Trejo in the Government’s control or custody or which you know or could know through due diligence exists; (3) any prior criminal record of Mr. Trejo; (4) the results or reports of any relevant physical or mental examination and of any scientific test or experiment.;
11. The immigration file for any Government witness;
12. Any documents evidencing or reports referencing any and all payments, applications for payments, and authorizations or denials of payments made to any witness or CI in this case;
13. All reports authored by FBI Agent Ale pertaining to Mr. Trejo or any matter related to this case, including but not limited to reports identifying the planning and approval process for the reverse sting operation(s) conducted in this case;
14. All reports authorized by any Government Agent pertaining to Mr. Trejo or any matter related to this case, including but not limited to reports identifying the planning and approval process for the reverse sting operation(s) conducted in this case;
15. All reports and internal agency documentation of the application and approval for the reverse sting operation done in this case;
16. All reports describing or referencing activities of or cooperation with the Government by Juradani – including without limitation reports concerning for the past 20 years, his prior real estate transactions, prior business transactions, and any alleged prior bad acts or prior involvement in laundering money or any other criminal activity;
17. The investigative file(s) and any investigative reports concerning Juradani including any representations, promises, or agreements made between the Government and him and any compensation or other consideration provided to him;
18. All e-mails, text messages, WhatsApp messages or any other communications between the U.S. Attorney’s Office or any investigative agent and Juradani or any of his representatives, agents, or attorneys;
19. Any affidavit relied upon to secure or seize any evidence or assets in this matter or any matter pertaining to Mr. Trejo;
20. Any MLAT request related to persons involved in this case or who are potential witnesses in this case;

21. A copy of any grand jury testimony relating to Mr. Trejo or this case;
22. Any and all *Brady* information related to Mr. Trejo;
23. Any and all *Giglio* information related to any potential witnesses that the Government intends to call at trial;
24. A specific list by date and item of all exports from Mr. Trejo and/or Best Medical that the Government alleges were facilitated by bribery as alleged in the Indictment; and
25. Identify specific regulations, licenses, or approvals that the Government alleges Mr. Trejo and/or Best Medical did not have for exportation purposes.

Thank you for your prompt attention. If the Government is unwilling or unable to produce any of the above requested items, please promptly identify such item and the basis for such refusal so we can confer before seeking relief from the Court.

Sincerely,



Jason Davis

JD:eg

cc: Mr. Alejandro Ballesteros

Via E-mail: [alejandro@ballesteroslaw.com](mailto:alejandro@ballesteroslaw.com)

**Erin Green**

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**From:** Erin Green  
**Sent:** Monday, October 19, 2020 5:44 PM  
**To:** 'Roberto.Lopez2@usdoj.gov'  
**Cc:** Jason Davis; alejandro@ballesteroslaw.com  
**Subject:** 7:20-cr-01676; USA v. Jose Luis Trejo  
**Attachments:** 2020 10-19 Ltr to AUSA Lopez.pdf

Dear Mr. Lopez,

Please see the attached correspondence on behalf of Jason Davis dated October 19, 2020.

Thank you for your attention and, if you have any questions, please do not hesitate to contact our office.

**DAVIS/  
SANTOS** / **Erin Green**  
**Paralegal**

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**Erin Green**

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**From:** Lopez, Roberto (USATXS) <Roberto.Lopez2@usdoj.gov>  
**To:** Erin Green  
**Sent:** Monday, October 19, 2020 7:00 PM  
**Subject:** Read: 7:20-cr-01676; USA v. Jose Luis Trejo

Your message

To: Lopez, Roberto (USATXS)  
Subject: 7:20-cr-01676; USA v. Jose Luis Trejo  
Sent: Monday, October 19, 2020 5:44:00 PM (UTC-06:00) Central Time (US & Canada)

was read on Monday, October 19, 2020 7:00:24 PM (UTC-06:00) Central Time (US & Canada).